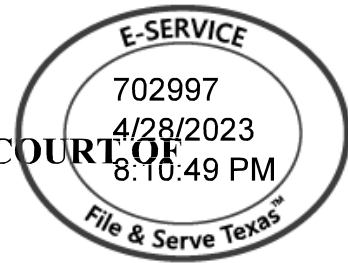


EXHIBIT D

CAUSE NO. 2020-67824**JANE DOE****V.****UBER TECHNOLOGIES, INC.
AND MANUEL ANTONIO
PORTILLO**§
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§**IN THE DISTRICT COURT OF****HARRIS COUNTY, TEXAS****125TH JUDICIAL DISTRICT****DECLARATION OF CATHERINE GIBBONS**

1. My name is Catherine Gibbons, I am over the age of 18, I am of sound mind and body, and I am capable of making this Declaration. I am offering this Declaration in the above-captioned cause in support of Defendant Uber Technologies, Inc.'s ("Uber") Response in Opposition to Plaintiff's Motion to Compel.

2. I am Director and Global Head of Platform Safety, Identity, Risk & Payment, Community Operations at Uber. I was first employed by Uber in May 2018 and have worked in safety support for the past five years. In my position, I am responsible for ensuring that appropriate safety response procedures are in place. The facts set forth herein are true and correct and are based on my own personal knowledge.

3. I am familiar with and have reviewed the unredacted document that has been Bates-Labelled for purposes of this litigation as **DAVISUBER_PRLOG000420** (the "Safety Policy Email"). I am also familiar with the circumstances surrounding its creation and communication. The Safety Policy Email was created in or about August 2019 to facilitate the rendition of professional legal services to Uber, namely, to obtain legal advice from Uber's in-house counsel on proposed safety policies. The Safety Policy Email contains correspondence from Uber's in-house legal counsel to other Uber employees detailing their impressions, thoughts, and advice with respect to the proposed policy.

My name is Catherine Gibbons, my date of birth is 08/02/1989, and my address is 1515 3rd St, San Francisco, CA 94158-2211. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Cabo San Lucas County, State of Mexicos, on the **27th** day of April, 2023.

Catherine Gibbons

Catherine Gibbons